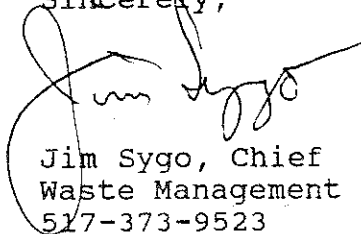


March 31, 1995

In the event that a TSCA permit and Act 64 renewal license are issued to the facility, they will contain conditions to insure that the facility operation does not result in emissions containing PCBs that adversely affect human health or the environment.

Thank you for providing your concerns. If you have any question regarding this information, please contact Mr. Peter Quackenbush, Senior Environmental Engineer, Waste Management Division, at telephone number 517-373-7397, or me.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Sygo", is written over a circular stamp. The signature is fluid and cursive.

Jim Sygo, Chief
Waste Management Division
517-373-9523

cc: Mr. Steve Johnson, U.S. EPA
Ms. Lorraine Kosik, U.S. EPA
Director Roland Harmes, DNR
Mr. Russell Harding, DNR
Mr. Ken Burda, DNR/HWP C&E File
Mr. Peter Quackenbush, DNR
Dr. Ben Okwumabua, DNR-Livonia

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JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909

ROLAND HARMES, Director

July 20, 1993

Mr. Steven Chapman
General Motors Corporation
Inland Fisher Guide Division
G-1245 East Coldwater Road
Flint, Michigan 48559-0001

Dear Mr. Chapman:

SUBJECT: Landfill Leak Detection System
Interim Monitoring Proposal
MID 005 356 860

I have received and reviewed the response to my letter dated May 24, 1993. The response was provided by Simon Hydro-Search in a letter dated June 14, 1993. This interim monitoring plan, when approved, must be implemented until the post-closure permit is issued. The responses to the June 14, 1993 letter are summarized below.

COMMENT 1: Since waste has been placed in all landfill cells at this time, the original comment to include cells E & F for baseline information is no longer appropriate. All cells must be included in the monitoring as individual sampling locations.

COMMENT 2: It is agreed to drop cadmium and lead for the leak detection system. However, cadmium and lead must be included in the leachate monitoring for one year (two semi-annual events) to confirm their absence.

COMMENT 3: It is agreed to only do dissolved analysis for metal for the interim monitoring program.

COMMENT 4: Monitoring of the leak detection system must be quarterly. The reason is that this system is intended to provide an early warning of potential problems prior to the possibility of release to the environment. With collection of valid data showing no problem in the leak detection system, the groundwater monitoring program could then be reduced after several years. In addition, the current policy for solid waste landfills and for hazardous waste landfills is quarterly monitoring at a minimum.

It is agreed that leachate sump monitoring can be semi-annual.

July 20, 1993

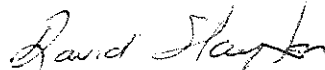
COMMENT 5: A one time sampling of leachate sumps for VOC's is not acceptable. Sampling for VOC's in the leachate sumps must be annual until a post-closure permit is issued. More than one sampling event is required to confirm the absence of VOC's, particularly since the S-lagoon material has yet to be placed in the landfill. The need for continued VOC monitoring can be addressed during review of the post-closure permit application.

COMMENT 6: It is agreed to drop the monthly indicator parameter sampling.

COMMENT 7: An annual evaluation of liner performance during the interim monitoring period is acceptable. The data, however, must be submitted as it is obtained. The evaluation procedures are acceptable as listed.

A revised leak detection monitoring program or a response to these comments must be submitted to this office by August 20, 1993. Initial testing must begin within 30 days following approval of the plan as was proposed in your letter. If you have any questions, please contact me.

Sincerely,



David Slayton
Hazardous Waste Permits Section
Waste Management Division
517-373-8012

cc: Ms. Elizabeth Browne, DNR-Shiawassee
Ms. Liane Shekter Smith, DNR
HWP/C&E File

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STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909

ROLAND HARMES, Director

March 3, 1993

RECEIVED SEP 14 1993
WMD RCRA
RECORD CENTER *Compliance*

Mr. Jeff Hartlund
Environmental & Safety Eng. Staff
Ford Motor Company
Suite 608
15201 Century Drive
Dearborn, Michigan 48120

Dear Mr. Hartlund:

SUBJECT: Annual Groundwater & Leachate Reports
Allen Park Clay Mine (MID 980 568 711)

The Michigan Department of Natural Resources, Waste Management Division, Hazardous Waste Permits Section, is in receipt of your annual groundwater report, dated December 20, 1992, and your annual leachate report, dated February 26, 1993, for the Allen Park Clay Mine. These reports were submitted pursuant to conditions contained in your Act 64 Hazardous Waste Operating License for the facility.

Staff have reviewed both of these annual reports and find that they meet the reporting requirements of 1979 P.A. 64, as amended (Act 64), which references 40 CFR 265.94(a)(2)ii-iii and 265.94(b)(2), and the requirements for leachate reporting contained in the company's Act 64 Hazardous Waste Operating License.

Sincerely,

Virginia L. Loselle
Environmental Quality Specialist
Hazardous Waste Permits Section
Waste Management Division
517-373-7974

cc: ✓ Ms. De Montgomery, DNR/U.S. EPA Reporting
Dr. Ben Okwumabua, DNR-Livonia
Ms. Elaine Bennett, DNR
Mr. Pete Quackenbush, DNR
HWP/C&E File

STATE OF MICHIGAN

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JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909
ROLAND HARMES, Director

February 10, 1993

Mr. Jerome S. Amber
Wastes & Hazardous Substances
Ford Motor Company
Suite 608
15201 Century Drive
Dearborn, Michigan 48120

RECEIVED SEP 14 1993
WMD RCRA
RECORD CENTER *Compliance*

Dear Mr. Amber:

SUBJECT: Act 64 Permit Annual Groundwater Report
MID 980 568 711

Your facility is permitted under Michigan Act 64, P.A. 1979, as amended. The permit requires that your facility submit an annual groundwater report by March 1 of each year. To date, this office has not received your report. Please send three copies of the report to:

Geotechnical Support Unit
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30241
Lansing, Michigan 48909

If there are any questions, please contact me. Response to this notification is due by March 1, 1993.

Sincerely,

Elaine Bennett
Geotechnical Support Unit
Waste Management Division
517-373-8028

cc: ✓ De Montgomery/U.S. EPA
Livonia District Office
HWP/C&E File

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DEPARTMENT OF NATURAL RESOURCES

John Hannah Building, P.O. Box 30241, Lansing, MI 48909
ROLAND HARMES, Director

RECEIVED SEP 14 1993
WMD RCRA
RECORD CENTER Ph.B

January 28, 1993

Mr. Dave O'Connor
Ford Motor Company, Clay Mine
Oakwood Blvd. & Southfield Hwy.
Allen Park, MI 48101

Dear Mr. O'Connor:

SUBJECT: Act 64 Permit Annual Groundwater Report
MID 980 568 711

Your facility is permitted under Michigan Act 64, P.A. 1979, as amended. The permit requires that your facility submit an annual groundwater report by March 1 of each year. To date, this office has not received your report. Please send three copies of the report to:

Geotechnical Support Unit
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30241
Lansing, Michigan 48909

If there are any questions, please contact me. Response to this notification is due by March 1, 1993.

Sincerely,

Elaine Bennett
Geotechnical Support Unit
Waste Management Division
517-373-8028

cc: De Montgomery/U.S. EPA
Livonia District Office
HWP/C&E File



KE: Ben
cc: USEPA cover letter
only
Kunt
Lang

RECEIVED

FEB 07 1992

WASTE MANAGEMENT

Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive
Dearborn, Michigan 48120

January 27, 1992

Ms. Mindy Koch, Acting Chief
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Subject: Submittal of Environmental Monitoring Results
Ford Allen Park Clay Mine Landfill
EPA ID No. MID 980 568 711

Dear Ms. Koch:

Enclosed, pursuant to Condition I.E.9.c of our Michigan Act 64 Operating License, are Act 64 soil (i.e., to establish background values), Cell I leachate and Cell I lysimeter monitoring results.

Should you have any questions regarding this submittal, please contact David O'Connor of this Office at 313/322-0701.

Sincerely,

Jerome S. Amber, P.E., Manager
Industrial Waste and Toxic/
Hazardous Substances
Environmental Quality Office
313/322-4646

Enclosures

cc: Mayors of Allen Park, Dearborn and Melvindale
John Ciotti
Joe Wisk

NATURAL RESOURCES COMMISSION

THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
ELLWOOD A. MATTSON
O. STEWART MYERS
RAYMOND POUPORE

STATE OF MICHIGAN



JAMES J. BLANCHARD

John Engler
Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48909

DAVID F. HALES, Director

May 13, 1991

Mr. Dave O'Connor
Ford Motor Company
Environmental Quality
15201 Century Drive, Suite 608
Dearborn, Michigan 48120

Dear Mr. O'Connor:

SUBJECT: Act 64 Permit Annual Reports
Ford Allen Park Clay Mine, MID 980 568 711

Thank you for your telephone call Thursday, May 9, assuring us that the 1990 annual summary reports had been sent for both leachate volume and analysis, and groundwater flow direction with a potentiometric contour map. The submittal dates you gave were helpful. The reports were on time and they are in our files.

Please make a note for future annual reports, that we require three copies, as we forward a copy to the DNR District Office and the Federal Government. Since we handle annual reports a little differently than quarterly reports, and since your annual contour map has no deadline date, it would be helpful for you to prominently mark your reports as Annual Reports. Alternatively, sending them to my attention would greatly facilitate tracking. Thank you for your cooperation.

If you have questions, please contact me at Waste Management Division, Department of Natural Resources, P.O. Box 30241, Lansing, Michigan 48909, or at the telephone number below.

Sincerely,

Elaine Bennett
Hazardous Waste Permits Section
Waste Management Division
517-373-8028

cc: Ms. De Montgomery, DNR
Mr. Pete Quackenbush, DNR
✓ S.E. Michigan District
HWP/C&E File

STATE OF MICHIGAN

NATURAL RESOURCES COMMISSION

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KERRY KAMMER
ELLWOOD A. MATTSOHN
O. STEWART MYERS
RAYMOND POUPORE



John Engler

~~JAMES J. BLANCHARD~~, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING
P.O. BOX 30028
LANSING, MI 48909

DAVID F. HALES, Director

May 1, 1991

Mr. Dave O'Connor
Ford Motor Company
Environmental & Safety
Suite 608
15201 Century Drive
Dearborn, Michigan 48120

Dear Mr. O'Connor:

SUBJECT: Act 64 Permit Annual Reports
Ford Allen Park Clay Mine
MID 980 568 711

Your facility is permitted under Michigan's Hazardous Waste Management Act, 1979 P.A. 64, as amended. The permit requires under Part IV B.2.b. that your facility submit an annual leachate summary report by March 1 of each year. The permit also requires in Part IV A.2. an annual determination of groundwater flow direction and a potentiometric contour map. Please send three copies of each report to:

Geotechnical Support Unit
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30241
Lansing, Michigan 48909

If there are any questions, please contact me. Response to this notification is due by May 15, 1991.

Sincerely,

Elaine Bennett
Geotechnical Support Unit
Waste Management Division
517-373-8028

cc: ✓ Ms. De Montgomery, DNR
Mr. Pete Quackenbush, DNR
S.E. Michigan District
HWP/C&E File

orig: S. [unclear] / De / Pete → Monitoring Report File
✓ AC. Ben

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OCT 31 1990

cc: USEPA

Waste Management Council
Division



Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive
Dearborn, Michigan 48120

October 30, 1990

Mr. Alan Howard, Chief
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Subject: Submittal of Environmental Monitoring Reports
Ford Allen Park Clay Mine Landfill
EPA ID No. MID 980568711

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NOV 06 1990

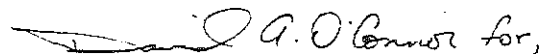
WASTE MANAGEMENT DIV.

Dear Mr. Howard:

Enclosed, as required by our Michigan Act 64 Operating License, are monitoring reports for the following facility sampling programs: 1) lysimeter 1-B (lysimeter 1-A did not yield a sufficient aliquot of sample), 2) Act 641 surface water (to establish background), and 3) semi-annual Detroit Water and Sewerage Department leachate.

Should you have any questions regarding this submittal, please contact David O'Connor of this Office at 313/322-0701.

Sincerely,

 J. O'Connor for,

Jerome S. Amber, P.E.
Principal Staff Engineer
Environmental Quality Office
313/322-4646

Enclosures

cc: Mayors of Allen Park, Dearborn and Melvindale
Ardys Bennett
Joe Wisk



Environmental and Safety Engineering Staff
Ford Motor Company

Suite 608
15201 Century Drive
Dearborn, Michigan 48120

October 22, 1990

Mr. Alan Howard, Chief
Waste Management Division
Michigan Department of Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Subject: Submittal of Environmental Monitoring Reports
Ford Allen Park Clay Mine Landfill
EPA ID No. MID 980568711

Dear Mr. Howard:

Enclosed are second quarter Act 64 surface water and semi-annual Act 64 sediment monitoring reports (to establish background) for the subject facility, as required by our Michigan Act 64 Operating License. Included also is a pH monitoring report of the facility sewage effluent, verifying compliance with Detroit Water and Sewerage Department requirements.

Should you have any questions regarding this submittal, please contact David O'Connor of this Office at 313/322-0701.

Sincerely,

Jerome S. Amber, P.E.
Principal Staff Engineer
Environmental Quality Office
313/322-4646

Enclosures

cc: Mayors of Allen Park, Dearborn and Melvindale
Ardys Bennett
Joe Wisk

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OCT 23 1990

Waste Management
Division

orig: Re/Steve/Rite → M. Datta
File

Exc: Ben

RECEIVED
EPA
conservation

OCT 30 1990

WASTE MANAGEMENT DIVISION

De
Bob

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

INTEROFFICE COMMUNICATION

September 5, 1990

To: Pete Quackenbush, HW Permits Section, WMD
Donald Mbamah, SE MI Field Office, WMD

From: Liz Browne, WMD Env. Monitoring Coordinator *Liz*

Subject: Ford Allen Park Clay Mine
MID 980 568 711

Several submittals related to the facility's environmental monitoring programs have been received. As these submittals deal with both District compliance issues and permit condition changes a joint district/permits memo is being generated. Much of the review deals with Ford's July 27, 1990 letter responding to Donald's June 28, 1990 letter. Additional reviews of the data submittals for the various monitoring programs have also been undertaken.

Comments to responses dealing with the facility's environmental monitoring program are as follows:

1. Issue: Leak detection lysimeters. The facility's plan to address problems with the lysimeters is acceptable. One caution is that the facility should understand that background for these units will still be non-detect. This is supported by Ford's data indicating that the water used during this project tested non-detect for the DNR Scan 7 and 8 compounds.
2. Issue: Sampling and analysis concerns from the 3/8/90 memo. Ford is requesting that new analytical methods and detection limits be allowed for the facility programs. As the laboratory has not changed, it is not clear why changes are being requested so soon after permit issuance. The changes requested are acceptable, however, there is still a major concern relative to this issue. The facility should seek approval of changes to the sampling and analysis plan that appears in their permit prior to implementation. If any of the changes suggested had not been approved, the facility would have had to address the deficiencies with their monitoring data.

The other items from the 3/8/89 memo have been adequately addressed at this time. Tracking of the facility's submittals will have to be done to ensure that continued

compliance is maintained. Items such as the apparent misinterpretation of the 10-11-89 DNR Scan 8 data will not be readily accepted in the future. The May 14, 1990 surface water data submittal is missing a value for arsenic. It is hoped that the new ownership and the new computer system at the laboratory will reduce problems with future data submittals. Both laboratory and facility staff should be encouraged to monitor the quality of the reports that are being submitted.

A copy of the updated analytical methods and detection limits for the inorganic constituents is attached. This new table should be incorporated into the facility's operating license to maintain its accuracy.

Please let me know if you have questions on this memo. Reviews of future data submittals will continue, with emphasis on the manner in which the identified concerns are being handled.

cc: Ms. D. Montgomery ✓
HWP C&E File
Permit File

TABLE 6
Section N
Environmental Monitoring

<u>Parameter</u>	<u>Analysis</u>	<u>Det. Limit</u>	<u>Container/ Preservative</u>	<u>Holding Time</u>
Iron	6010 (1)	0.02 mg/l	P, G, N	6 mos
Alkalinity	310.1 (3)	4 mg/l	P, G, R	24 hrs
Carbonate	403 (2)	4 mg/l	P, G, R	14 day
Bicarbonate	403 (2)	4 mg/l	P, G, R	14 day
Chlorides	407A (2)	4 mg/l	P, G	28 day
Sulfate	9038 (1)	0.02 mg/l	P, G, R	28 day
Spec. Cond.	9050 (1)	NA	P, G, R	24 hrs
pH	9040 (1)	NA	NA	D
Cyanide	9010 (1)	0.02 mg/l	P, G, S	14 day
BOD	405.1 (3)	4 mg/l	P, G	24 hrs
COD	410.4 (3)	4 mg/l	P, G, A, R	28 day
TOC	9060 (1)	1 mg/l	P, G, A, R	28 day
Phenolics	9065 (1)	0.002mg/l	G, T	28 day
Calcium	6010 (1)	0.02 mg/l	P, G, N	28 day
Sodium	6010 (1)	0.02 mg/l	P, G, N	28 day
Magnesium	6010 (1)	0.02 mg/l	P, G, N	28 day

- (1) EPA SW 846 "Test Methods for Evaluating Solid Wastes".
- (2) Standard Methods 16th Edition
- (3) EPA 600/4-79-020 "Methods for Chemical Analysis of Water & Wastes"

P: Plastic
G: Glass
R: Refrigeration
T: Teflon-lined cap
N: Nitric acid to pH < 2
A: Sulfuric acid to pH < 2
D: Determine on site
S: Sodium hydroxide to pH > 12

